

RICHARD J. HAYDEN
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Attorney for FORD MOTOR CREDIT COMPANY

UNITED STATES BANKRUPTCY COURT
DISTRICT OF IDAHO, TWIN FALLS

In re:

LYNN KETTERLING dba
KETTERLING FARMS and
JEANNE KETTERLING

Debtors.

Chapter 7
NO. 03-41318

DECLARATION OF
JOHN SCHAEFFER
IN SUPPORT OF RELIEF

COMES NOW, JOHN SCHAEFFER under penalty of perjury
pursuant to federal law, and states as follows:

My name is JOHN SCHAEFFER, and I am over the age of
eighteen (18) and make this declaration based upon personal
knowledge.

1. DEFAULT. I am a bankruptcy manager in charge of the
debtor's file with FORD MOTOR CREDIT COMPANY. I am employed by
FORD MOTOR CREDIT COMPANY (hereinafter "FMCC"). FMCC has a
secured interest in one 1999 FORD 4X4 EXPEDITION VIN#
1FMPU18L3XLC47394;

2. COMPETENCY. I am thoroughly familiar with the file and

DECLARATION OF
JOHN SCHAEFFER
AND CERTIFICATE OF MAILING

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ORIGINAL

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A Professional Service Corporation

have reviewed the file before making this declaration. It is my testimony that as of the date of this declaration, the debtors on this contract are 6 months in default in the amount of \$ 2947.00 to FMCC from 9/10/03 to 2/10, 2004. The debtor owes a total net amount of \$ 7497.97 plus fees and costs, to FMCC.

2. CURE. As of the date the motion was filed, there has been no full cure of the arrearage.

3. VALUE OF COLLATERAL. I assert that, based upon the value of the collateral and the fact that certain mobile collateral declines over time and can decline quite precipitously, FMCC believes that it is not adequately protected. The collateral is depreciating. The current value that is arrived at is \$16,825.00.

4. EQUITY. The debtor is believed to have equity in the collateral.

5. STATEMENT OF ACCOUNTING. Attached is exhibit 1 hereto is a recent accounting statement for this account as of the date of execution of this declaration.

I declare, under penalty of perjury pursuant to federal law, that the above is true and correct, to my personal knowledge and belief.

DATED this 12th day of February, 2004.


JOHN SCHAEFFER

DECLARATION OF
JOHN SCHAEFFER
AND CERTIFICATE OF MAILING

STATEMENT OF ACCOUNT

Lynn Ketterling
 Acct.: 48063000000020866914
 1999 FORD EXPEDITION
 1FMPU18L3XLC47394

09/10/99 7080 AUTO DEBIT PAYM	555.90
10/11/99 7080 AUTO DEBIT PAYM	555.90
11/10/99 7080 AUTO DEBIT PAYM	555.90
12/10/99 7080 AUTO DEBIT PAYM	555.90
01/10/00 7080 AUTO DEBIT PAYM	555.90
02/10/00 7080 AUTO DEBIT PAYM	555.90
03/10/00 7080 AUTO DEBIT PAYM	555.90
04/10/00 7080 AUTO DEBIT PAYM	555.90
05/10/00 7080 AUTO DEBIT PAYM	555.90
06/12/00 7080 AUTO DEBIT PAYM	555.90
07/10/00 7080 AUTO DEBIT PAYM	555.90
08/10/00 7080 AUTO DEBIT PAYM	555.90
09/11/00 7080 AUTO DEBIT PAYM	555.90
10/10/00 7080 AUTO DEBIT PAYM	555.90
11/10/00 7080 AUTO DEBIT PAYM	555.90
12/11/00 7080 AUTO DEBIT PAYM	555.90
01/10/01 7080 AUTO DEBIT PAYM	555.90
02/12/01 7080 AUTO DEBIT PAYM	555.90
03/12/01 7080 AUTO DEBIT PAYM	555.90
04/10/01 7080 AUTO DEBIT PAYM	555.90
05/10/01 7080 AUTO DEBIT PAYM	555.90
06/11/01 7080 AUTO DEBIT PAYM	555.90
07/10/01 7080 AUTO DEBIT PAYM	555.90
08/10/01 7080 AUTO DEBIT PAYM	555.90
09/10/01 7080 AUTO DEBIT PAYM	555.90
10/10/01 7080 AUTO DEBIT PAYM	555.90
11/12/01 7080 AUTO DEBIT PAYM	555.90
12/10/01 7080 AUTO DEBIT PAYM	555.90
01/10/02 7080 AUTO DEBIT PAYM	555.90
02/11/02 7080 AUTO DEBIT PAYM	555.90
03/11/02 7080 AUTO DEBIT PAYM	555.90
04/10/02 7080 AUTO DEBIT PAYM	555.90
05/10/02 7080 AUTO DEBIT PAYM	555.90
06/10/02 7080 AUTO DEBIT PAYM	555.90
07/10/02 7080 AUTO DEBIT PAYM	555.90
08/12/02 7080 AUTO DEBIT PAYM	555.90
09/10/02 7080 AUTO DEBIT PAYM	555.90
10/10/02 7080 AUTO DEBIT PAYM	555.90
11/11/02 7080 AUTO DEBIT PAYM	555.90
12/10/02 7080 AUTO DEBIT PAYM	555.90
01/10/03 7080 AUTO DEBIT PMT	555.90
02/10/03 7080 AUTO DEBIT PMT	555.90
02/19/03 9080 RETURN - R01	-555.90
03/12/03 8080 REGULAR PAYMENT	555.90
03/28/03 8080 REGULAR PAYMENT	27.80
05/13/03 8080 REGULAR PAYMENT	556.00
06/23/03 8080 REGULAR PAYMENT	556.00
10/01/03 8080 REGULAR PAYMENT	300.00
10/31/03 8080 REGULAR PAYMENT	300.00
12/01/03 8080 REGULAR PAYMENT	300.00
12/29/03 8080 REGULAR PAYMENT	300.00
01/28/04 8080 REGULAR PAYMENT	300.00